

24 July 2013

**Via Email and Federal Express**

Ms. Sharon Fang (3H521), Remedial Project Manager  
U.S. Environmental Protection Agency – Region III  
1650 Arch Street  
Philadelphia, PA 19103

**Subject: Request for 90-day Extension for Intermediate (60%) Design Submittal  
Operable Unit 2 North Penn Area 5 Superfund Site  
Unilateral Administrative Order (UAO)  
Docket No. CERCLA-03-2012-0205DC**

Dear Ms. Fang:

On behalf of Stabilus, Inc., please except this letter as formal request for a 90-day extension for completion of the Intermediate (60%) Design Submittal. As we discussed during a telephone conversation on 22 July 2013, the extension is necessary to further delineate groundwater trichloroethene (TCE) concentrations within Operable Unit 2 (OU2). As defined in the ROD, the target EISB treatment zone is the OU2 overburden groundwater where TCE concentrations are equal to or greater than 100 micrograms per liter ( $\mu\text{g/L}$ ); thus, an objective of the Pre-Design Investigation (PDI) activities is to delineate TCE to 100  $\mu\text{g/L}$  or less. Our preliminary PDI results indicate that the spatial distribution of groundwater TCE concentrations above 100  $\mu\text{g/L}$  on the northwestern corner of the former BAE property is not delineated. Specifically, the western edge of this OU2 overburden groundwater TCE concentrations have been preliminarily measured at 380  $\mu\text{g/L}$ , 640  $\mu\text{g/L}$ , and 400  $\mu\text{g/L}$ , in temporary well locations TW34, TW35 and TW36, respectively, and are not bound further west by concentrations below the 100  $\mu\text{g/L}$  requirement. Delineation further west and southwest of these locations is necessary to define the enhanced in situ bioaugmentation (EISB) treatment area and complete the 60% Design Submittal.

Delineation to the west and southwest will require access to both the Sensor and Antenna Systems (Sensor) property and Whistlestop Park property. For Whistlestop Park, Montgomeryville Township requires preapproval for each proposed sampling location and coordination with their park operations / scheduled recreational activities. Whistlestop Park is an active community recreational facility and the area requiring further delineation is located near and/or within the baseball playing field on the park property. Given the uncertainty of access to

this area in light of seasonal recreational use, additional time will be required to access and implement the planned activities.

Advanced Drilling, the PDI drilling subcontractor, requires a three to four week lead time based upon their current availability. Additionally, coordination and scheduling of the USEPA personnel and USEPA laboratory for split sample collection will be necessary as we discussed during our call. Further to our discussion on 22 July 2013, USEPA will require an addendum to the 30% Design Submittal / PDI Work Plan that presents the proposed Supplemental PDI sampling locations and will need time to approve the plan. The data resulting from the Supplemental PDI groundwater samples will undergo the analytical and data validation review requirements set forth in the 30% Design and will be incorporated in the 60% Design Submittal.

Given the above, the anticipated timing for the Supplemental PDI field activities is late August or early September 2013. Per the timeline submitted within the Revised Preliminary (30%) Design Submittal dated 14 June 2013, the 60% Design Submittal is due on 29 August 2013. We request a 90-day extension and approval of a new due date for the 60% Design Submittal on 27 November 2013. An addendum to the 30% Design Submittal will be submitted under separate cover outlining the proposed Supplemental PDI sampling locations. This notification and request for a modification of the previously approved timeline is being submitted pursuant to Section VI Paragraph 26.b of the Unilateral Administration Order (the "Order"). In accordance with that section of the Order, we respectfully request that USEPA provide written approval of this request. If you have any questions, please do not hesitate to contact me.

Sincerely,



Derek W. Tomlinson, P.E.  
Project Coordinator

cc: Tim Cherry, PADEP (*via email & 1 hardcopy first class mail*)  
M. Joel Bolstein, FoxRothschild  
Chris Voci, P.G., Geosyntec  
File: PH0013